

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

Children of the Court, a non-profit corporation, and, Judiciocracy LLC)
Plaintiffs,) Case No: 1:25-cv-03387-AMP-GAF
v.) Judge April M. Perry
Attorney Registration and Disciplinary Commission, Lea S. Gutierrez, and Tammy Evans, in their official capacities)
Defendants.

PLAINTIFFS CHILDREN OF THE COURT AND JUDICIOCRACY LLC'S REQUEST FOR JUDICIAL NOTICE PURSUANT TO RULE OF EVIDENCE 201

Pursuant to Federal Rule of Evidence 201, Plaintiffs respectfully request that this Court take judicial notice of the following documents and records, which are matters of public record or official rules not subject to reasonable dispute as to their accuracy or authenticity:

I. Illinois ARDC Charging Document Against Plaintiffs' Key Man

Description: An official charging document issued by the Illinois Attorney Registration and Disciplinary Commission (ARDC) against Edward "Coach" Weinhaus, filed on April 3, 2025, after the initiation of this litigation. EXHIBIT A.

Basis for Notice: This document is a public record maintained by the ARDC, an administrative arm of the Illinois Supreme Court, and its existence and contents can be readily verified through official sources.

II. Verified Petition and Supplemental Affidavit in Cook County Case No. 2016D004685 Paris v. Paris

Description: A Verified Petition filed in the Circuit Court of Cook County, Illinois, Case No. 2016D004685, which includes a litigant's ARDC complaint about the same issue raised by

Defendants in this case, includes the original issue sent to the ARDC, and exhibits including docket entries reflecting violations of Illinois Supreme Court Rules, including Illinois Rule of Professional Conduct (IRPC) 1.9 which was also referenced in Plaintiff Judiciocracy's 'offensive article' also therein. EXHIBIT B.

Basis for Notice: This is a publicly filed court document, and its contents—including the referenced ARDC complaint and docket entries—are capable of accurate and ready determination by resort to the records of the Circuit Court of Cook County.

III. Verified Petition, Subsequent Affidavit in Cook County Case No. 2016CH07155 and Recusal Order of Hon. Thaddeus L. Wilson As A Result Of Same

Description: A Verified Petition filed in the Circuit Court of Cook County, Illinois, Case No. 2016CH07155, filed on March 28, 2025 and subsequent Affidavit filed by the Plaintiffs' KeyMan Weinhaus on April 14, 2025, and Court's recusal order thereafter. EXHIBIT C.

Basis for Notice: These documents are part of a public record of a judicial proceeding in the Circuit Court of Cook County, and its existence and contents are not subject to reasonable dispute as they can be confirmed through official court filings.

IV. The Missouri Secretary of State Filing Of Creation for Judiciocracy LLC

Description: The valid secretary of State filing for Judiciocracy LLC in Missouri showing its creation in 2023. EXHIBIT D.

Basis for Notice: This document is a public record outside the geographic area of this Court however its source is not in dispute – a state secretary of a state of the United States.

V. Illinois Supreme Court Rules 1.1, 1.3, 1.9, 1.13 and Comments

Description: Illinois Supreme Court Rule of Professional Conduct:

1.1: "**Competence**," along with its official comments, as adopted and published by the Illinois Supreme Court, effective 1/1/2010.

1.3: “**Diligence**,” along with its official comments, as adopted and published by the Illinois Supreme Court, effective 1/1/2010.

1.9: “**Duties to Former Clients**,” along with its official comments, as adopted and published by the Illinois Supreme Court, effective 5/19/2021.

1.13: “**Organization As Client**,” along with its official comments, as adopted and published by the Illinois Supreme Court, effective 1/1/2010.

Together, EXHIBIT E.

Basis for Notice: These are official rules of the Illinois Supreme Court, publicly available and authoritative, governing attorney conduct in Illinois, and their text and comments are not subject to reasonable dispute.

VI. Ryan Cleys’ Statement To The ARDC

Description: Ryan M. Cleys’ statement as filed as part of *Farah v. Double M. Express, Inc.*, Case #1:24-cv-01757 N.D.Ill. ECF #4-1, Exhibit to Corrected Motion for Pro Hac Vice (*granted*), incorporated by reference.

Basis for Notice: This document is a public record of a judicial proceeding before this Court. This is a signed letter to the Defendants establishing an attorney’s good faith belief. It does not establish that the Plaintiffs’ statements (complained about in the ARDC complaint) are truthful, but that there is a reasonable basis for their truth by a licensed attorney who referenced the document in Item III above, where Plaintiffs’ affiant Timpone swore the basis of truth as well.

VII. The Docket Of Case styled as Control New MLSS LLC et al v. Timpone et al, Cook County Case # 2016CH07155

Description: The docket of the underlying case upon which Judge Wilson ruled contains information related to this action. Incorporated by reference.

Basis for Notice: The full docket of the underlying case offers proof as a matter of legal consequence of the veracity of the Plaintiffs' statements.

VIII. The Docket List of Cases for Hon. Thaddeus L. Wilson and Hon. Regina A. Scannicchio

Description: The list of cases in the Cook County Circuit Court of Judges Wilson and Scannicchio. Incorporated by reference.

Basis for Notice: This document is a public record within the geographic area of this Court. These lists of cases demonstrates that the Plaintiffs' key man had no pending cases before either Judge at the time of the speech.

Legal Basis for Request

Federal Rule of Evidence 201(b) permits a court to take judicial notice of facts that are not subject to reasonable dispute because they (1) are generally known within the trial court's territorial jurisdiction, or (2) can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned. The documents listed above satisfy these criteria as they are either public court records or official rules promulgated by the Illinois Supreme Court. Judicial notice of such materials is routine in federal courts. See, e.g., *Denius v. Dunlap*, 330 F.3d 919, 926 (7th Cir. 2003) (taking judicial notice of public records); *United States v. Jones*, 29 F.3d 1549, 1553 (11th Cir. 1994) (noting courts may take judicial notice of docket entries and filings in other courts); *Mendocino Ry. v. Ainsworth*, 113 F.4th 1181, 1188 n.6 (9th Cir. 2024) (granting judicial notice for business documents filed with the California Secretary of State but denying email communications for the same).

Purpose of Request

Plaintiffs request judicial notice of these documents to establish the basis of the organizations as pre-existing entities, for evidence of the serious and immediate nature of the

matters including the Complaint filed against the key man, that the key man had no cases in front of the judges, that the key man had tried to share this information with the Defendants but to no avail, that the Defendants are not pursuing any legitimate purpose and in fact are harming the public and abdicating their duties. Plaintiffs do not seek judicial notice of the truth of *disputed* factual assertions within these documents, but rather their existence and legal effect as matters of record or law.

WHEREFORE, Plaintiffs respectfully request that this Court:

- A) Take judicial notice of the above-referenced documents pursuant to Federal Rule of Evidence 201;
- B) Permit Plaintiffs to submit copies of these documents as exhibits to this request, if required by the Court; and
- C) Grant such other and further relief as the Court deems just and proper.

Dated: April 20, 2025

Respectfully Submitted:

s/ Antonio Valiente
Antonio Ernesto Valiente-Rivera
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CERTIFICATE OF SERVICE

I, Antonio Ernesto Valiente-Rivera, do hereby certify that I have caused to be sent by First Class Mail a copy of the herein Motion, Memorandum, Affidavits, Notice of Presentment, Request for Judicial Notice and Complaint to the Defendants. Additionally, I will have the same included with the requested Summons as submitted to the Intake Clerk of the Court today.

Defendants ARDC and Lea S. Gutierrez
130 East Randolph Drive,
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Tammy L. Evans
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s/ Antonio Valiente
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